

PA 00 4337903

BRAEBURN

ALLOY STEEL

Lower Burrell, PA 15068 412/224-6900

August 8, 1984

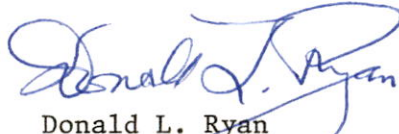
Ms. Shirley Bulkin
EPA Region III
P. O. Box 1480
Philadelphia, Pa. 19107

Dear Ms. Bulkin:

Enclosed please find an updated Preparedness, Prevention,
And Contingency Plan For Braeburn Alloy Steel Company.

Sincerely yours,

BRAEBURN ALLOY STEEL



Donald L. Ryan
Vice President-Operations

DLR/rlk

Enclosure

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U.S. EPA, Region III

BRAEBURN

Division of CCX, Inc.

Revision I
August, 1984

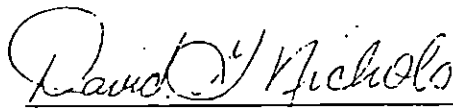
PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN
FOR

BRAEBURN ALLOY STEEL DIVISION
CCX, INC.
LOWER BURRELL, PENNSYLVANIA 15068

MAY 1982

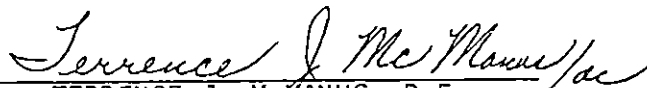
BCM PROJECT NO. 03-4098-04

PREPARED BY



DAVID G. NICHOLS, P.E.
SENIOR ENGINEER

APPROVED BY



TERRENCE J. McMANUS, P.E.
ASSISTANT VICE PRESIDENT

BETZ•CONVERSE•MURDOCH•INC.
5777 BAUM BOULEVARD
PITTSBURGH, PENNSYLVANIA 15206

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1.0 INTRODUCTION

Pennsylvania contains a wide variety of manufacturing and commercial industries. Many of these industries have the potential to degrade the environment or endanger public health and safety by the accidental release of toxic, hazardous, or other polluttional materials. In recognition of this fact, the Pennsylvania Department of Environmental Resources (DER) and the U.S. Environmental Protection Agency (EPA) have developed preventive approaches to address potential problems.

Several state and federal programs have been developed to prevent the endangerment to public health and safety caused by accidental releases of toxic, hazardous, or other polluttional materials to the environment. These programs are: Pollution Incident Prevention (PIP), Best Management Practice (BMP), Spill Prevention Control and Countermeasure (SPCC), and the Contingency Planning Program (CPP). The main differences between the programs are the types of industrial activities and the nature of the polluting material addressed. In developing the Preparedness, Prevention and Contingency (PPC) plan, the DER has attempted to consolidate all the similarities of the various state and federal pollution incident prevention and emergency response programs. Thus, an industrial or commercial facility will be able to satisfy the requirements of all four programs without unnecessary duplication.

The Braeburn Alloy Steel Division (Braeburn) of CCX, Inc., located in Lower Burrell, Pennsylvania, retained Betz-Converse-Murdoch-Inc. (BCM) to assist in preparation of a Preparedness, Prevention, and Contingency (PPC) plan. The Braeburn organizational structure for the development, implementation, and maintenance of the PPC plan is set forth in Table 1.

TABLE 1

ORGANIZATIONAL STRUCTURE FOR IMPLEMENTING THE PPC PLAN

<u>Name</u>	<u>Title</u>	<u>Duties and Responsibilities</u>
Charles Emery	President	Overall responsibility for all Braeburn's operations, including pollution control systems and programs.
Donald Ryan	Vice President- Operations	Periodically review and evaluate the PPC plan and recommend modifications. Responsible for emergency coordination, evaluation of the effects of new construction or process changes on the PPC plan.
William Moret	Press Department Supervisor	Responsible for emergency coordination, inspection programs, and spill clean-up in Press Forge area of plant.
Erle Sayer	Maintenance Superintendent	Responsible for emergency coordination, inspection programs, preventive maintenance, and spill clean-up activities in all areas of plant other than Press Forge area.

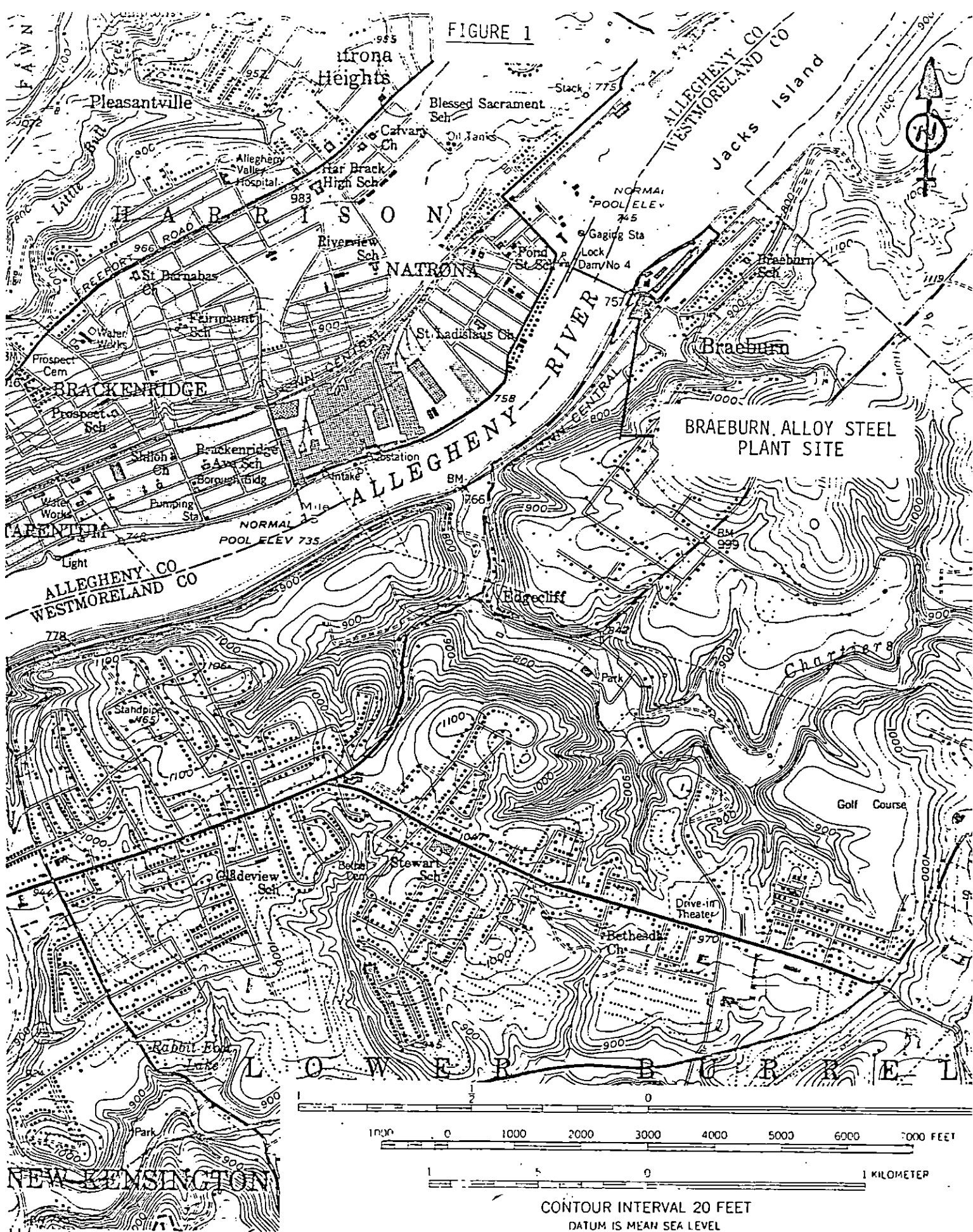
2.0 GENERAL DESCRIPTION OF INDUSTRIAL ACTIVITY

The Braeburn Alloy Steel Division of CCX, Inc., manufactures high-speed and tool steels, including bars and forgings, shear tools, and knives for the cutting of sheet steel at the plant in Lower Burrell, Pennsylvania. The Braeburn plant has been located in Westmoreland County, along the southeastern bank of the Allegheny River (see Figure 1) since 1898.

Steel making and finishing processes utilized at the Braeburn plant include rolling, hammer forging, annealing, forge pressing, metallizing, cold finishing, and machining. Alloy steels are produced from chrome, nickel, vanadium, and tungsten. Depending upon the type of steel desired, the appropriate mixture of scrap and billets are charged to the electric furnace.

The general site layout, property boundaries, secure and open areas, areas occupied by buildings, entrance and exit routes, and outfall points are presented in Figure 2. The building layouts, raw material, and product storage areas, loading and unloading areas, wastewater treatment and solid waste handling facilities, and well system are shown on Exhibit I.

FIGURE 1



1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET

DATUM IS MEAN SEA LEVEL

NEW KENSINGTON EAST, PA

SW/4 FREEPORT 15' QUADRANGLE

N4030—W7937.5/7.5

Betz • Converse • Murdoch • Inc.

PENNSYLVANIA

- 4 -

3.0 MATERIAL AND WASTE INVENTORY AND COMPATIBILITY

3.1 Material Inventory

All raw materials, which are utilized during production of various alloy steels at the Braeburn plant, arrive in the form of metal scrap, ingots, briquets, granules, or powders. There are no major pickling or metal cleaning operations at this plant. Tables 2 and 3 provide descriptions of the plant buildings and storage areas with a summary of the type of materials handled in each area. Copies of pertinent literature, technical bulletins, safety data sheets, and scientific literature have been included in Appendix A.

Scrap metal is presently stockpiled according to alloy content in the eastern end of the Melting Department in the Mill Building and the primary outside storage area located between the eastern end of the Mill Building and the railroad tracks. An older storage area situated between the Mill Building and the Allegheny River has been phased out. Scrap is typically received from scrap vendors or returned by purchasers of Braeburn Steel for reprocessing in open-top drums. In some cases, the scrap material is oily, while in other cases it is not. Braeburn has completed plans to excavate contaminated soil from the scrap storage areas and disposed of the material in an approved landfill. Braeburn now utilizes bins in a converted section of the Melting Department in the eastern end of the Mill Building (see Figure 2). Oily scrap is now stored according to alloy content in bins, and excess oil is collected in an existing lined pit for periodic removal and transfer to the waste oil storage tank.

TABLE 2
DESCRIPTION OF BRAEBURN PLANT BUILDINGS

<u>Plant Building</u>	<u>Land Areas Occupied (Square Feet)</u>	<u>Materials Handled</u>
Mill Building	107,400	Lime, fluorspar, calcium carbide, ferrochrome, ferromolybdenum, ferrotungsten ferrosilicon, cobalt, ferrovanadium, scheelite, molyoxide, and dolomite
Cold Finishing and Warehouse Building	31,300	Grinding coolants, soluble oils, and muriatic acid
Saw Building	3,000	-
Forge Press Building	38,100	Solvents and hydraulic oil
Metallurgical Lab	10,600	Mineral acids, butylacetate, ether, caustic, and salts
Machine Shop and Heat Treatment	10,100	Grinding coolants and soluble oils
Main Office Building	8,500	Anhydrous ammonia for (blueprint) reproduction
Vacuum Melt Building	7,400	-
Well Houses	1,600	-
Maintenance Building	600	-
Sewage Treatment	<u>200</u>	Granular chlorine
	218,800	

TABLE 3
DESCRIPTION OF BRAEBURN STORAGE AREAS

<u>Designation*</u>	<u>Storage Area</u>	<u>Location</u>	<u>Materials Stored</u>
A	Oil Storage (drums)	Adjacent to hydraulic pump room in Press Department	Hydraulic oil
B	Oil House (drums)	North of Annealing Dept. in Mill Bldg.	Oils, greases, kerosene, & solvents
C	Waste Oil Storage (2,000-gal. tank)	Adjacent to south side of Forge Press Bldg.	Lubrication oils
D	Etching Acid (carboys & drums)	North side of Cold Finishing Dept. & Warehouse	Muriatic acid
E	Propane Tank (740-gal. tank)	Southeast of the Mill Bldg. adjacent to cyclone fence and railroad tracks	Propane
F	Oily Scrap Storage (drums)	South of Melting Dept. in Mill Bldg. adjacent to cyclone fence and railroad tracks	Scrap metal
G	Emission Dust (covered bin)	Outside east end of Melting Dept. in Mill Bldg.	Electric furnace dust
H	Transformers	Anneal, hammer shop, electric furnace, and press substations	Filled with oils free of PCB
I	Landfill	East of Braeburn Rd. and south of railroad tracks on property formerly owned by Ben Franklin Coal Co.	Furnace slag

* See Site Plan - Exhibit I

A small amount of organic solvents, amounting to a few gallons per month, are used to clean tools and machinery. Small quantities of various mineral acids and butyl acetate are used in the metallurgical laboratory during testing operations. Oily waste materials produced in the metallurgical laboratory are collected in containers for periodic deposit into the waste oil storage tank.

Three (3) 12,000-gallon storage tanks, which are located to the east of the Forge Press Building and surrounded by a concrete retaining wall with a 20,000-gallon containment capacity, were formerly used for No. 2 fuel oil. At the present time, the tanks are empty and Braeburn does not envision using this facility in the near future.

A closed loop recirculating system, which includes a 3,000-gallon covered reservoir for hydraulic oil, is used in the Press Department. Any leaks or spills from this system would be collected in a pit under the floor and pumped to the waste oil storage tank.

All lubrication oils used in the plant, except the hydraulic oil for the Press Department, are stored in the Oil House for distribution to the rest of the plant on an as needed basis. The Oil House is located between the Mill Building and the Cold Finishing Department and Warehouse. The door is normally locked, and any spillage would be contained within the building. Absorbent material is also stored in the Oil House for use there or anywhere else in the plant it may be needed. Typically, the Oil House contains half a dozen 55-gallon drums, and an equal number of 20-gallon drums containing kerosene and various lubricants.

Propane is stored in a 740-gallon tank located to the east of the Mill Building in an area adjacent to the area used for oily scrap storage near the railroad tracks. Any spills would quickly vaporize before reaching any sewer or building.

3.2 Waste Inventory

The operations performed at the Braeburn plant generate two (2) hazardous wastes subject to provisions of the regulations promulgated by the United States Environmental Protection Agency (EPA) pursuant to the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, and DER's hazardous waste regulations. The hazardous wastes have been summarized on Table 2 with the EPA identification numbers and criteria for listing hazardous waste. Records are maintained by Braeburn (Generator No. PAD004337903) at the plant.

Electric furnaces are operated five (5) days per week during two (2) turns at the Braeburn plant. The emission control dust generated by the electric furnace is identified as hazardous waste (No. K061) from a specific source in the iron and steel industry by US EPA. The dust is screw conveyed into a day hopper on the northern side of the Mill Building. The day hopper is emptied into a large skip box daily. The skip box is located outside the eastern end of the Mill Building. Both boxes are covered with a tarp to prevent dust blowing. Mill Services, Inc. (Transporter No. PAD004835146) of Yukon, Pennsylvania, hauls the dust from the plant every 6-8 weeks for disposal. Approximately 15,000 lbs. of dust are produced monthly, or 90 tons per year.

Braeburn maintains a small tank (approximately 10 gallons) of 20% muriatic acid (dilute hydrochloric acid) in the Etch Room located adjacent to the Cold Finishing Department for purposes of cleaning or etching small metal samples before metallurgical analysis. Unused muriatic acid is stored in carboys in a diked area outside of the Cold Finishing Department and Warehouse near the door to the Etch Room. A laboratory analysis of a sample of the spent muriatic acid (refer to Appendix B) in November 1981, which is diluted (50-50) with well water before use, indicated that the total chromium concentration (1,500 mg/l) was in excess of the maximum allowable concentration (5 mg/l) for the characteristic of EP Toxicity (No. D007) and the pH was less than the minimum allowable value (2.0 Standard Units) for the characteristic of Corrosivity (No. D002). As a

result, Braeburn has instituted the following procedure in accordance with RCRA regulations:

Spent muriatic acid is removed from the etch tank twice per week and placed in special acid-proof 55 gallon containers obtained from the waste hauler for this purpose..

Containers of spent acid are stored in the diked area adjacent to the Etch Room.

An approved hauler, presently Ecology Chemical Corp. of Manorville, Pennsylvania (Transporter No. PA AH0039) picks up about 250 gallons in the containers of spent acid every 12 weeks for disposal.

Solid waste materials are also generated in the form of electric furnace slag or cinders at the Braeburn plant. Analyses of composite slag samples conducted during March 1981 and April 1982 (refer to Appendix B) concluded that the material is not a hazardous waste and resulted in the classification of the slag as a "Type II Demolition Material" by DER. Braeburn currently disposes of approximately 300 tons of slag annually at a landfill on company-owned property adjacent to the plant site. A Phase I-Part I permit application for operation of a solid waste disposal site has been submitted to DER for approval.

Waste lubrication oils from the plant are stored in a 2,800 gallon tank, surrounded by a block wall with a containment capacity of approximately 4,500 gallons. The waste oil storage tank, which is located on the southern side of the Forge Press Building, also receives small quantities of oily wastes collected in the metallurgical testing laboratory. Approximately 2,000 gallons of waste oil are removed by a commercial hauler (Liquix, Inc. 100 River Road, Pittsburgh, Pa.) approximately 4-5 times per year.

TABLE 4
HAZARDOUS WASTE SOURCES

<u>Waste Type</u>	<u>Criteria/Listing</u>	<u>EPA Identification No.</u>
Electric Furnace Dust	Toxic Waste*	K061
Spent Etching Acid (20% Muriatic)	EP Toxicity (chromium)** Corrosive (pH less than 2)**	D007 D002

* Per Subpart D - List of Hazardous Wastes, Section 261.32 - Hazardous Wastes from Specific Sources, of US EPA regulations.

** Per Subpart C - Characteristics of Hazardous Wastes, Sections 261.22 - Characteristic of Corrosivity and 261.24 - Characteristic of EP Toxicity, of US EPA regulations.

3.3 Wastewater/Stormwater Outfalls

The general layout of the Braeburn plant, including the locations of the wells and outfall sewers, are shown on Exhibit I (refer to envelope at rear of the plan). A schematic diagram of the water flows in the plant is presented on Exhibit 3.

The plant obtains water from four (4) drilled wells, each of which has an estimated capacity of approximately 300 gallons per minute, for process water; a well for potable water in the eastern end of the plant; and two (2) connections to the public water system owned by the Municipal Authority of the City of New Kensington for fire protection in the entire plant and potable water in the western end of the plant.

The six (6) outfalls discharging wastewater and/or stormwater from the plant are governed by the conditions set forth in the National Pollutant Discharge Elimination System (NPDES) Permit No. PA 0001406. The monitoring requirements, limitations, and major contributing sources are summarized for each outfall on Table 5. All outfalls discharge into the Allegheny River with the exception of Outfall 005, which flows into a lagoon located to the west of the plant.

TABLE 5

OUTFALL DISCHARGE SUMMARYMonitoring Requirements and Limitations

<u>Outfall</u>	<u>Parameter (Units)</u>	<u>Average Daily</u>	<u>Daily Maximum</u>	<u>Frequency</u>	<u>Contributing Sources</u>
001	Flow (MGD)	-	-	Monthly	Noncontact cooling water from reheat furnaces and forging press
	Temperature (°F)	-	110	Monthly	
	Oil & Grease (mg/l)	-	-	Monthly	
	pH (Standard Units)*	-	9.0	Monthly	
002	Flow (MGD)	-	-	Quarterly	Area drains and sinks in Metallur- gical Laboratory Building
	Temperature (°F)	-	-	Quarterly	
	Oil & Grease (mg/l)	15	30	Quarterly	
	pH (Standard Units)*	-	9.0	Monthly	
003	Flow (MGD)	-	-	Monthly	Area drains; noncon- tact cooling water from electric fur- naces, compressor in aluminizing area and reheat furnaces, and contact water from rolling mills
	Suspended Solids (lb/day)	25	75	Monthly	
	Oil & Grease (mg/l)	15	30	Monthly	
	Temperature (°F)	-	110	Monthly	
	pH (Standard Units)*	-	9.0	Monthly	
004	Flow (MGD)	0.001	-	Quarterly	Wastewater (sanitary) treatment plant effluent
	Suspended Solids (lb/day)	30	45	Quarterly	
	BOD ₅ (mg/l)	30	45	Quarterly	
	Fecal Coliform (No/100 ml)	200	400	Quarterly	
	pH (Standard Units)*	-	9.0	Monthly	
005	Flow (MGD)	-	-	Monthly	Noncontact cooling water from compres- sors, roof drains and area drains
	Temperature (°F)	-	110	Monthly	
	Oil & Grease	-	-	Monthly	
	pH (Standard Units)*	-	9.0	Monthly	
012	Oil & Grease (mg/l)	15	30	Quarterly	Area drains

* pH shall not be less than 6.0 standard units.

4.0 PLANT OPERATION - PREPAREDNESS AND PREVENTION

4.1 Manufacturing

The Braeburn plant employs approximately 350 workers and occupies about 43.0 acres of land area. The major production operations include the follows:

- 10 inch Rolling
- 14 inch Rolling
- Hammer Forging
- Annealing
- Forge Pressing
- Cold Finishing
- Machining
- Metallizing

A variety of materials are employed throughout the Production Department. In addition, small quantities of chemicals are used in the metallurgical laboratory, sewage treatment plant, and office building. A complete inventory of all chemicals is presented in Appendix A.

4.2 Maintenance and Security

4.2.1 Internal and External Communications

Internal communications are provided by a combination of the in-plant telephone system with 85 extensions in seven (7) buildings and an auto-call system which rings throughout the plant to page personnel. Fire alarms can be triggered manually or automatically upon activation of sprinkler systems in critical areas.

External communications are provided from 20 telephones located throughout the plant. In addition, the fire hall in the neighboring community of Braeburn is located within 500 feet of the main entrance to the plant.

4.2.2 Security Procedures

The Braeburn plant is secured to prevent accidental or unauthorized intentional entry. All buildings are located within an area encompassed by cyclone fence. All points of access or vehicular entrance are controlled by watchmen at the guardhouse or locked gates.

Security personnel are on duty at all times, including weekends or holidays when the plant is not operating. Watchmen monitor activity in the alloy storage room and Mill Building from the guardhouse by closed circuit television to supplement regular patrols in the plant. Visitors must sign in with the receptionist in the office building or watchman in the guardhouse when entering the plant. Floodlights illuminate the plant area at night.

4.2.3 Preventive Maintenance

Material potentially deleterious to the environment may be spilled during plant operations such as receiving, storage, production, and disposal. To prevent the breakdown of the in-plant material handling systems and minimize the possibility of discharging pollutants to the air or wastewater, a system of preventive maintenance is used. Equipment involved in production and material handling, including pumps, compressors, and tanks are periodically inspected for proper operation and leakage as a minimum. The condition of mechanical equipment deemed critical to production in the plant, including all equipment in the press area, is tracked on a regular maintenance schedule to assure appropriate adjustments, repairs, tests, and replacement.

Records of equipment maintenance and repairs are kept at the plant.

4.2.4 Inspection and Monitoring

Spills may be caused by continuous seepage or slow leakage from plant equipment. In an effort to curtail spills, Braeburn personnel conduct an inspection and monitoring program. Inspections are made regularly of storage facilities, piping networks, handling areas, and disposal systems for potential spills or evidence of leaks. All outfalls and the sewage treatment plant are inspected daily for visible signs of physical or chemical contamination.

Detailed inspections of equipment such as piping, valves, pumps, tanks, and storage drums are performed periodically.

4.2.5 Housekeeping

Housekeeping procedures are oriented toward preventing spills and providing safe working conditions. Laborers are regularly assigned to perform housekeeping duties at the Braeburn plant. All surplus materials are stored in an orderly manner according to type in designated areas, which are monitored for spillage or leakage to allow for prompt removal. Waste materials generated during production are accumulated in covered boxes (trash and electric furnace dust), storage tanks (waste oils), or drums (spent acid) before removal and disposal by licensed contract haulers.

5.0 POLLUTION INCIDENTS - RESPONSE AND CONTAINMENT

5.1 Pollution Incident History

A brief history of known pollution incidents at the Braeburn plant is set forth as follows:

- September 28, 1973: A pollution report was called in by the Pennsylvania Fish Commission. A discharge of oil had been noted and called to the attention of the PA Fish Commission at 10:30 a.m. The company located the source of the leak and arranged to acquire an oil boom from Triad. Oil at Outfall 003 was determined to be coming from the 10-inch Rolling Mill.

The Triad boom was installed quickly and oil was being contained by 4:30 p.m. The company was informed to check oil boom and remove captured oil as required.

- April 30, 1974: An oil discharge was detected at Mile 24.3 on the Allegheny River.
- August 20, 1974: A penalty payment of \$500.00 as made by Braeburn for the pollution incident of April 30, 1974.
- September 30, 1976: US Coast Guard (USCG) inspected Outfall 003. No formal inspection was made and no report was necessary. The USCG discussed the adequacy of the present boom set up to prevent oil discharge to the river and informed Braeburn that, with proper maintenance, periodic cleaning of the boom area, and changing of absorbent material, the present system is acceptable.

- March 1, 1979: Samplings taken by Barry Pollock, Waterways Patrolman, PA Fish Commission, revealed high oil concentrations in the river in the immediate vicinities of Outfalls 001 and 003. The oil in Outfall 001 was traced to leaking machinery parked over a floor drain leading to the outfall. This practice has been stopped. There is no evidence that any spill or incident caused the high oil levels around Outfall 003, other than normal operations at the 10-inch Rolling Mill. The installation of Ryerlube Poly Plugs in Ryertex bearings and thrust collars on the 10-inch rolling mill has resulted in the substantial reduction of the oil and grease content in the discharge at Outfall 003.
- April 10, 1979: Samplings of Outfall 012 indicated that the permissible limits for oil and grease were exceeded due to oily runoff from a scrap storage area. Braeburn subsequently was informed of fines in the total amount of \$8,000 payable to the Pennsylvania Fish Fund (PA Fish Commission) and Clean Water Fund (DER).
- January 22, 1982: At a meeting with representatives of Braeburn and DER, several environmental compliance issues were discussed. The discharge of wastes containing oil and grease contents in excess of the permitted limit were reported by DER at Outfalls 002 and 005. Investigations conducted by Braeburn determined that the disposal of oily waste into the metallurgical testing lab and oil leaking from a faulty compressor into a floor drain were the causes of this problem. Braeburn subsequently took action to eliminate the sources of contamination.

5.2 Implementing the PPC Plan

5.2.1 Employee Emergency Training

Braeburn presently employs an informal program of employee training for emergency procedures by supporting employee participation in volunteer fire and ambulance organizations. To supplement this special training, Braeburn proposes to establish an informational employee emergency training program that complies with the PPC plan requirements. The program will ensure that facility personnel are familiar with preparedness, prevention, and contingency procedures. The program will include:

An overview of the regulations contained in the Pollution Incident Prevention (PIP) plan and the Resource Conservation and Recovery Act (RCRA);

General spill control information and specific information on types of spills, precautions, containment, and safety equipment;

Identification of areas where spills could occur, chemicals handled, and typical action to be taken; and

Methods for cleaning up spills and disposing of hazardous wastes.

5.2.2 Emergency Coordination

Emergency coordination at the Braeburn plant will be handled by a response team comprised of key management personnel. The Vice President-Operations, Donald Ryan, will be responsible for immediate emergency procedures. The list of emergency coordinators for incidents in the Forge Press and all other areas of the plant is presented as Table 6, with their addresses and telephone numbers in the order of command.

In the event of an emergency, an employee would notify his supervisor, who would notify the Vice President-Operations, Donald Ryan, who would then notify the members of the emergency coordination team. For any pollution incident during the afternoon (4:00 p.m. to midnight) or night (midnight to 8:00 a.m.), the guardhouse (Extension 237) is also to be notified.

Whenever there is an emergency, such as a discharge, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and affected plant areas. At the same time, the emergency coordinator must assess the potential for hazards to human health and the environment that may result from the incident.

Those incidents at the facility which could result in an imminent threat or actual emergency are as follows:

A fire or explosion associated with flammable chemicals, fuels, or lubricants.

A significant spill from a tank or truck used to deliver, store, or transport waste.

A failure or malfunction of any process or supporting equipment resulting in the direct discharge of pollutants to the environment.

TABLE 6

LIST OF EMERGENCY COORDINATORS

PRESS FORGE AREA

<u>Name and Position</u>	<u>Office Location (Extension No.)</u>	<u>Home Telephone No.</u>
Donald Ryan (Vice President-Operations)	Plant Office (204-215)	412/335-9091
William Moret (Press Dept. Supervisor)	Press Department (250)	412/339-9940
Robert Lambermont (Press Maint. Supervisor)	Press Department (201)	412/337-6325

Note: Order of notification during regular work hours is Moret, Lambermont, Ryan. During nonwork hours, order of notification is Ryan, Moret, Lambermont.

ALL OTHER AREAS

<u>Name and Position</u>	<u>Office Location (Extension No.)</u>	<u>Home Telephone No.</u>
Donald Ryan (Vice President-Operations)	Plant Office (204-215)	412/335-9091
Erle Sayer (Maintenance Supt.)	Maintenance Office (222)	412/373-0317

Note: Order of notification during regular work hours is Sayer, Ryan. During nonwork hours, order of notification is Ryan, Sayer.

If the emergency coordinator decides that a spill, fire, or explosion poses an imminent or actual threat to human health or the environment, he must immediately:

- Activate facility alarms or communication system, where applicable, to notify facility personnel
- Telephone the Department of Environmental Resources (717) 787-4343 and the National Response Center (800) 424-8802, and give them the following information:
 1. Name of emergency coordinator;
 2. The facility's name (Braeburn) and location;
 3. Phone number of the emergency coordinator;
 4. Date, time, and location of the incident; and
 5. A brief description of the incident, the materials or wastes involved, the quantity of materials or wastes, the extent of environmental (land, water, air) contamination, the extent of any injuries, and the possible hazards to human health or the environment.
- Notify the applicable local authorities if evacuation of local areas may be advisable.

During an emergency, the coordinator must take all reasonable measures necessary to stop the source, contain any releases, and isolate affected areas. Immediately after an emergency, the coordinator, with the DER's approval, must provide for the treatment, storage, or disposal of any residue or contaminated soil. Particular attention must be paid to the incompatibility of any released materials with other materials in the affected area.

Within fifteen (15) days after the incident, a written report must be submitted to the DER containing the following information:

- Name, address, and telephone number of the individual filing the report.
- Name, address, and telephone number of the facility.
- Date, time, and location of the incident.
- A brief description of the circumstances causing the incident.
- Description and estimated quantity by weight and volume of material or wastes involved.
- An assessment of any contamination of land, water, or air caused by the incident.
- Estimated quantity and disposition of recovered materials or wastes that resulted from the incident.
- A description of the actions the facility intends to take to prevent a similar incident from occurring.

5.2.3 Agencies, Emergency Response Contractors, and Hospitals

5.2.3.1 Regulatory Agency Notification

All pollution incidents resulting in an imminent or actual emergency, or in the implementation of the PPC plan, must be reported to the appropriate regulatory agencies. Braeburn must notify the following government agencies:

Department of Environmental Resources, Operations Section
Harrisburg Regional Office
407 South Cameron Street
Harrisburg, Pennsylvania 17120
Telephone: (717) 787-9665 (8:00 a.m. to 4:00 p.m. - weekdays)
Telephone: (717) 787-4343 (nights, holidays, and weekends)

Department of Environmental Resources
Pittsburgh Regional Office
100 Forbes Avenue
Pittsburgh, Pennsylvania 15222
Telephone: (412) 565-5091 (8:00 a.m. to 4:00 p.m. - weekdays)
Telephone: (412) 565-5023 (nights, holidays, and weekends)

US Environmental Protection Agency, Region III
Permit Programs Monitoring Unit, 3EN43-MI
6th and Walnut Streets
Philadelphia, Pennsylvania 19106
Telephone: (215) 597-9992
24-Hour Emergency Number: (215) 597-9898

5.2.3.2 Emergency Response Contractors

Several companies are available for spill clean-up and emergency response services. The following are the primary and secondary emergency response companies:

Primary Contractor: Burrell Construction & Supply Co.
1 Fifth Street, New Kensington, PA
412/362-4000 or 412/339-1011

Secondary Contractors: Richardson Construction
R. D. No. 3; Tarentum, PA
412/274-8600
or
Rob-Bern Associates Inc.
3122 Lebanon Church Rd.; West Mifflin, PA
412/469-3302

An additional list of emergency response companies is included in Appendix C.

5.2.3.3 Police, Fire and Hospital

The local police and fire departments of the City of Lower Burrell are available to respond to any incident which may require their assistance. The police department can provide assistance in isolating an affected area, controlling crowds, and evacuating downwind residents.

The local fire departments, which include ambulance sources, can provide assistance in controlling fires involving flammable materials and transporting injured to medical facilities. The phone numbers are as follows:

- City of Lower Burrell
 - Police Department (412) 335-2800
Schreiber Street
- City of Lower Burrell
 - Fire Company No. 2 (412) 224-9921
Arnold Avenue, Braeburn
 - Fire Company No. 3 (412) 339-9255
Reimer Street
 - Fire Company No. 4 (412) 224-9744
Braevew

Ambulance and hospital services are available at the following facilities:

- Allegheny Valley Hospital (412) 224-5100
1300 Carlisle Street
Natrona Heights, PA
- Citizens General Hospital (412) 337-3541
651 4th Avenue
New Kensington, PA
- Allegheny General Hospital (412) 359-3333
Life Flight Emergency Helicopter
320 East North Avenue
Pittsburgh, PA

5.2.4 Safety and Emergency Equipment

The Braeburn plant maintains adequate safety and emergency equipment, and a supply of spill clean-up material should be available for use in responding to pollution incidents. A list of safety and emergency equipment is included as Appendix D. In addition, emergency equipment is available from the local fire company on Arnold Avenue.

5.2.5 Emergency Recordkeeping

The facility keeps records of spills so that the plant personnel can document exactly what chemicals were involved, the extent of the spill, any effect on personnel and the environment, and the procedures used to stop, contain, isolate, and clean up the spill. Adequate records must be kept to ensure that the facility always has sufficient emergency equipment on site.

A spill report form and a safety equipment and spill clean-up material status report form for Braeburn are shown in Appendix E.

5.2.6 Evacuation Plan for Facility Personnel

A fire or explosion caused by a flammable material or waste can potentially require personnel to evacuate the facility. Because the plant is equipped with fire alarms and an internal communication system which can be heard in all areas of the facility, employees will be alerted and can be directed towards the safest location.

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR

BRAEBURN ALLOY STEEL DIVISION

CCX, INC.

APPENDIX A

CHEMICALS USED IN PRODUCTION

Mobil D.T.E.[®] 20 Series

Hydraulic Oils

The Mobil D.T.E. 20 series of high quality oils has been developed specifically to satisfy the requirements of hydraulic systems using the newer, high-pressure, high-output pumps. The large growth in hydraulic operation of systems on mobile equipment has resulted in the development of pumps that are smaller, yet deliver greater volumes of fluid at higher pressures than were thought practicable a few years ago. Since response time is improved when a smaller volume of fluid at higher pressure is used, high pressure pumps are also being applied increasingly in hydraulic systems of machine tools and other industrial applications. Pump vanes or pistons, control valves, and linear and rotary actuators of hydraulic systems all operate with boundary or mixed film lubrication so that wear protection must be provided by thin oil films. As pressures and operating speeds are increased, the loading on these thin films is increased, and the fluid must provide greatly enhanced antiwear or film strength characteristics to protect against excessive wear. At the same time, oxidation and foaming resistance, demulsibility, and rust and corrosion protection must be maintained at high levels to avoid other operating problems.

PRODUCT DESCRIPTION

The Mobil D.T.E. 20 series was developed in cooperation with pump and hydraulic system component manufacturers to provide the superior antiwear and film strength characteristics necessary for the new, high pressure hydraulic pumps that are coming into wide use. They are formulated from high quality, chemically stable, high VI base stocks combined with additives chosen to provide the specific properties required in hydraulic fluids. Compared to the best automotive oils, they provide superior performance characteristics including demulsibility, rust prevention, and resistance to deposit formation, and equal antiwear protection. In addition, the viscosities are chosen to accurately meet the requirements of hydraulic pump builders and coincide with the new ASTM viscosity grades. Furthermore, their functional characteristics permit a wide range of industrial applications other than in hydraulic systems.

In the development of the Mobil D.T.E. 20 series, extreme care was given to the selection of antiwear agents and rust inhibitors which will not interfere with water separating characteristics. The combination of additive components was carefully balanced with the base stocks to ensure that the final products provide the best obtainable combination of antiwear, demulsibility, oxidation resistance, rust protection, and foam resistance properties. A protective barrier is provided by a thin film of oil which prevents the rusting of metal parts in the presence of small

Characteristic	Mobil D.T.E. 24	Mobil D.T.E. 25	Mobil D.T.E. 26
Gravity, API	31.7	30.6	29.9
Specific Gravity	0.867	0.873	0.877
Pour Point, max. F (C)	0 (-18)	0 (-18)	0 (-18)
Flash Point, min. F (C)	395 (202)	400 (204)	400 (204)
Viscosity			
SUS at 100 F	153	225	300
SUS at 210 F	43	49	53
cSt. at 38 C	33	48.5	65
cSt. at 99 C	5.1	7.0	8.2
Viscosity Index	95	95	95
Rust, ASTM D 665, A & B	Pass	Pass	Pass
Color, ASTM, Max.	2.0	2.5	3.5
Cincinnati Milacron, Inc. C M Co Heat Test 1 Week at 275 °F (135 °C)	Pass	Pass	Pass

Mobil D.T.E. 20 Series

Hydraulic

amounts of water or condensed moisture from the air. They have shown superior fluid durability (resistance to deposit formation) and exceptional service performance.

TYPICAL CHARACTERISTICS

Physical and chemical characteristics of the Mobil D.T.E. 20 oils are shown in the data sheet table. Those values which are not shown as maximums or minimums are typical characteristics which may vary slightly.

APPLICATION

Mobil D.T.E. series oils are recommended for hydraulic applications in industrial, marine and mobile service. These oils are Mobil's primary recommendation for all hydraulic applications including the newer, high-pressure systems in industrial service, especially when the equipment manufacturer specifies the use of antiwear type hydraulic fluids.

Since Mobil D.T.E. 20 series oils are the primary hydraulic recommendation at all times, application consists mainly of selecting the proper grade for the particular system. Selection of the correct viscosity is based on ambient and bulk fluid temperatures, as well as the operating pressure and design characteristics of the pump and system. Mobil D.T.E. 24 is recommended frequently for small gear pumps, vane pumps and both radial and axial piston pumps. Mobil D.T.E. 26 is recommended as the oil meeting the viscosity requirements of vane pumps and gear pumps operating at high pressures or temperatures. It is also recommended for radial and axial piston pumps. Mobil D.T.E. 25 meets the viscosity requirements for many vane pumps and is an excellent product to simplify plant inventory, when a single oil is desired to replace one of 150 SUS (32 cSt) at 100 F (38 C) and another oil of 300 SUS (65 cSt) at 100 F (38 C).

Some hydraulic equipment manufacturers specify a preferred viscosity (at 100 F) for vane and axial piston pumps. Mobil D.T.E. 24 is recommended where a 150 second oil is specified; Mobil D.T.E. 25 for a 200 second oil and Mobil D.T.E. 26 for a 300 second oil. Other manufacturers base their recommendations on pump pressures. When this pressure is below 1000 psi (70 kg/cm²), Mobil D.T.E. 24 is recommended; below 1500 psi (105 kg/cm²), Mobil D.T.E. 25; and over 1500 psi (105 kg/cm²), Mobil D.T.E. 26.

Mobil D.T.E. 20 series oils are also recommended for many circulation, splash, bath and ring oiling systems supplying lubricant for the bearings and gears of industrial machinery. Their adaptability to these applications can greatly reduce inventory and lubrication costs where these oils are required for hydraulic use. They are not recommended for steam turbine nor ammonia refrigeration compressor service. Where no unusually high temperatures are involved, Mobil D.T.E. 26 may be used as the lubricant in single-stage reciprocating compressors up to 80 psig (5.6 kg/cm²) or in two-stage reciprocating compressors up to 150 psig (10.5 kg/cm²) of the type normally used for producing "plant" air.

ADVANTAGES

Mobil D.T.E. 20 series oils offer the following advantages and benefits:

- Outstanding antiwear performance
- High resistance to oxidation degradation
- Good protection against rust and corrosion
- Good foam resistance
- Good water separation in hydraulic systems
- Correct grades for hydraulic service
- Worldwide availability

TECHNICAL INFORMATION ON
ADDITIONAL MATERIALS
USED AT THE PLANT IS
BEING COMPILED BY BRAEBURN
PERSONNEL AND WILL BE
ATTACHED IN THIS APPENDIX.

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR

BRAEBURN ALLOY STEEL DIVISION

CCX, INC.

APPENDIX B

MATERIAL ANALYSES

- ELECTRIC FURNACE SLAG
- SPENT ETCHING ACID
- OIL CONTAMINATED SOIL

April 1982

MODULE 1 - CHEMICAL ANALYSIS - SLAG (COMPOSITE SAMPLE)
 BRAEBURN ALLOY STEEL
 LOWER BURRELL, PENNSYLVANIA

Parameter	Slag (as is) (mg/kg)	EP-Leachate* (mg/l)	EPA's EP-Toxic Criteria (mg/l)
Oil and Grease	110	> 1	N/A
Antimony, as Sb	ANR	0.155	N/A
Arsenic, as As	11.5	0.004	5.0
Barium, as Ba	186	0.827	100.0
Cadmium, as Cd	> 1.25	> 0.005	1.0
Chromium Total, as Cr	1520**	> 0.020	5.0
Chromium-Hexavalent, as Cr	ANR	> 0.020	N/A
Copper, as Cu	28.6	> 0.030	N/A
Lead, as Pb	> 25	> 0.100	5.0
Mercury, as Hg	3	0.001	0.2
Molybdenum, as Mo	911	0.503	N/A
Nickel, as Ni	39.5	> 0.100	N/A
Selenium, as Se	> 0.250	> 0.001	1.0
Silver, as Ag	55.5	0.052	5.0
Zinc, as Zn	4.83	> 0.004	N/A
Ammonia, Nitrogen-N	ANR	0.015	N/A
Solids, %	100	N/A	N/A
pH, units	11.7	10.8	N/A
Ignitability	Note (1)		

* The pH could not be adjusted to between 4.8 and 5.2 using the TEP limit for acetic acid addition.

** BCM Laboratory rerunning sample to confirm this value

ANR - Analysis not required for Module 1

N/A - Not Applicable

Note (1): Ignitability - no change in nature (i.e., no ignition) from Ambient to 400 deg. C.

March 30, 1981

Mr. Cecil C. Nelson
Plant Engineer
Braeburn Alloy Steel Division
Lower Burrell, PA 15068

Subject: EP Toxicity Analysis - Slag Sample
Hazardous Waste Determination
BCM No. 03-4098-02

Dear Mr. Nelson:

As per our telephone conversation of this date, we have completed the laboratory testing of the representative sample of slag, which was analyzed for metal content in accordance with Section 261.24 and Appendix II of the EPA Rules and Regulations for identification of hazardous waste. The test results, which are listed in the attached report, indicate that the metal content is considerably less than the allowable contaminant quantities for the characteristic of EP Toxicity, as follows:

<u>Parameter</u>	<u>Maximum Allowable Concentration (mg/l)</u>	<u>Test Results (mg/l)</u>
Arsenic	5.0	< 0.03
Barium	100.0	1.58
Cadmium	1.0	< 0.02
Chromium	5.0	0.06
Lead	5.0	0.47
Mercury	0.2	< 0.001
Selenium	1.0	0.009
Silver	5.0	0.04

We have informed Messrs. Unkovic (Meyer, Unkovic & Scott) and Wein (Department of Environmental Resources) of these test results by copy of this letter.

Three Rivers Group

November 18, 1981

Mr. Cecil C. Nelson
Plant Engineer
Braeburn Alloy Steel Division
Lower Burrell, Pennsylvania 15068

Subject: EP Toxicity Analysis - Acid Sample
Hazardous Waste Determination
Braeburn P. O. 60173
BCM No. 03-4098-02

Dear Mr. Nelson:

As per our letter proposal of October 29, 1981, we have completed the laboratory testing of a grab sample of spent hydrochloric acid from the etching tank (Sample A), which was analyzed for metal content and pH in accordance with Appendix II of the EPA Rules and Regulations for identification of hazardous waste. The test results, which are listed in the attached report, indicate that the total chromium content is considerably higher than the allowable contaminant quantities (EPA limits total chromium) for the characteristic of EP Toxicity, as follows:

Sample A Spent Acid:	<u>Parameter</u>	<u>Maximum Allowable Concentration</u>	<u>Test Results</u>
	Arsenic (mg/l)	5.0	0.392
	Barium (mg/l)	100.0	2.04
	Cadmium (mg/l)	1.0	0.066
	Chromium (mg/l)	5.0	1500.
	Lead (mg/l)	5.0	2.4
	Mercury (mg/l)	0.2	0.008
	Selenium (mg/l)	1.0	0.208
	Silver (mg/l)	5.0	1.02
	pH (Std. Units)	-	0.4
Sample B Diluted Spent Acid:	pH (Std. Units)	2.0	<0.1

Three Rivers Group

LABORATORY DIVISION
Appalachian Group
325 Thirteenth Street, Dunbar, W. Va. 25064
304: 766-6283

CLIENT

ATTN: Dave Nichols

BCM, Inc.

5777 Baum Blvd

Pittsburgh, PA

Lab No. 81-9866

Date Sampled: 11/4/81

Date Received: 11/9/81

Identification	Sample A Etching Tank Acid	Std. units
pH	0.4	
Arsenic	0.392	mg/l
Barium	2.04	mg/l
Cadmium	0.066	mg/l
Chromium	1500	mg/l
Lead	2.4	mg/l
Mercury	0.008	mg/l
Selenium	0.208	mg/l
Silver	1.02	mg/l

LABORATORY DIVISION
Appalachian Group
325 Thirteenth Street, Dunbar, W. Va. 25064
304: 766-6283

CLIENT

ATTN: Dave Nichols

BCM, Inc.

5777 Baum Blvd

Pittsburgh, PA

Lab No. 81-9867

Date Sampled: 11/4/81

Date Received: 11/9/81

Identification

Sample B Diluted Etching Tank Acid

pH

<0.1

Std. Units

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR

BRAEBURN ALLOY STEEL DIVISION

CCX, INC.

APPENDIX C

EMERGENCY CLEAN-UP RESPONSE COMPANIES

Burrell Construction & Supply Co.
1 Fifth Street
New Kensington, PA
412/362-4000 or 412/339-1011

Rob-Bern Associates Inc.
3122 Lebanon Church Road
West Mifflin, PA
412/469-3302

Richardson Construction
R. D. No. 3
West Mifflin, PA
412/469-3302

Beckwith Machinery Company
Route 22 East
Murrysville, PA
412/327-1300

Mill Service Inc.
1815 Washington Road
Upper St. Clair, PA
412/343-4906

Browning-Ferris Industries
West Noblestown Road
Carnegie, PA
412/923-1747 or 412/923-1740

West Penn Power Company
P. O. Box 71
Kittanning, PA
412/543-1111

Municipal Authority of the
City of New Kensington Water Dept.
920 Barnes Street
New Kensington, PA
412/337-3577 or 412/361-1991
412/335-8595 (Nights, holidays and weekends)

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR

BRAEBURN ALLOY STEEL DIVISION
CCX, INC.

APPENDIX D

SAFETY AND EMERGENCY EQUIPMENT

SAFETY AND EMERGENCY EQUIPMENT

Absorbant materials
Air compressor, nonmobile
Camera/photo equipment
Cellar pump
Chain hoist
Crane, yard
Explosimeter
Fans
Firefighting equipment
First aid supplies
Forklift
Fuel supply
Heaters, portable
Jack hammer
Jacks
Lighting, yard
Sand supply, limited
Stretchers
Submersible pump
Tool box
Welding/cutting equipment
Water pump

PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR

BRAEBURN ALLOY STEEL DIVISION
CCX, INC.

APPENDIX E

SPILL CLEAN-UP MATERIAL STATUS REPORT

Braeburn Alloy Steel Division
CCX, INC.
Lower Burrell, Pennsylvania

SAFETY EQUIPMENT AND SPILL CLEAN-UP MATERIAL STATUS REPORT

DATE: _____

DEPARTMENT: _____

	Quantity on Hand	Status		Quantity to be Replaced
		Good	Needs Replacement	
Brimmed Hat	_____	_____	_____	_____
Rubber Boots	_____	_____	_____	_____
Rubber Aprons	_____	_____	_____	_____
Plastic Apron	_____	_____	_____	_____
Face Shield	_____	_____	_____	_____
Goggles	_____	_____	_____	_____
Canvas Gloves	_____	_____	_____	_____
Rubber Gloves	_____	_____	_____	_____
Neoprene Suit	_____	_____	_____	_____
Respirator	_____	_____	_____	_____
Filters (Type _____)	_____	_____	_____	_____
Air Pack	_____	_____	_____	_____
Spill Containment/Clean Up				
• Absorbent Material	_____	_____	_____	_____
• Acid Neutralizer	_____	_____	_____	_____
• Caustic Neutralizer	_____	_____	_____	_____

N/A: Equipment not applicable for this department

SIGNATURE: _____

DEPARTMENT: _____

PRINT NAME: _____

EXTENSION: _____

Braeburn Alloy Steel Division
CCX, INC.
Lower Burrell, Pennsylvania

SPILL REPORT

Time of Spill: _____

Chemical: _____

Place: _____

Department Where Chemical Originated: _____

Type of Accident: _____

Personnel Who Handled Spill: _____

Safety Equipment Used: _____

How Was Accident Handled: _____

Methods To Avoid Future Spills: _____

SIGNATURE: _____

PRINT NAME: _____

Today's Date: _____

Spill Date: _____

Quantity Spilled: _____

DEPARTMENT: _____

EXTENSION: _____